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27 February 1969

MEMORANDUM FOR: Assistant Deputy Director for Support

SUBJECT : Coordination of Regulatory Proposals

1. This memorandum contains, in paragraph 4, a recommendation for action.

2. The status report on the work of the Regulations Control Branch, submitted concurrently with this memorandum, directs our attention anew to a continuing problem faced by the personnel charged with carrying out the responsibilities of the DDS for timely coordination of regulations. The problem is, of course, the apparent unwillingness or inability of the representative of the DDP to meet due dates established for coordination, and generally to hold proposals, inquiries, and indeed fully coordinated regulations awaiting final signature, for weeks, months, or at times, years.

3. In conversation on the coordination problem on 14 February 1969 the Chief, Regulations Control Branch learned from the Chief, DDP/Publications Control Group, that the latter attaches little significance to speedy processing of regulations. As noted by Chief, Regulations Control Branch in his report, "it is difficult to devise a control system to insure timely processing of cases when a third of the cases are controlled, in effect, by another unit which is not responsive to our priority system." He goes on to point out that the other coordinators are responsive to our due dates, but that the DDS commitment to the goal of speedy processing cannot be realized until DDP's cooperation is obtained.

4. I recommend, therefore, that discussion of this problem be undertaken with the DDP or senior members of his staff, and that they be asked to adopt for the Clandestine Services a coordination policy consistent with the Inspector General's 1965 recommendation that "the Deputy Director for Support fix and enforce a specific deadline for the coordination of each proposed regulation, not to exceed 30 days."

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You may want to discuss this first with the SSA-DDS, who has had occasion recently to handle the informal but speedy coordination of several matters of particular interest to the DDP.



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Chief, Support Services Staff

Attachment

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24 Feb 1969

MEMORANDUM FOR: Mr. Coffey

VIA

:

*Handwritten initials*

SUBJECT

:

Regulations Control Branch Status Report

1. Four months have elapsed since the last status report on the work of the Regulations Control Branch. The tables which we first presented in October 1968 have been updated and are attached. Some explanatory remarks follow.

2. Table A shows jobs received and completed each month. (A discrepancy becomes apparent when the December and January figures are compared. We believe this was caused by our method of keeping track of jobs completed in the branch but not yet distributed by OL/PSD. We have revised our record-keeping to eliminate such errors.) The input figure continues to fluctuate, and a relatively high input in November, coupled with a period when considerable illness and holiday leave cut into our output, led to the reversal of the declining trend reported earlier.

3. Table B shows the status of jobs in process at the end of each month. The factors noted in paragraph 2 are also reflected in this table. Jobs on hand surged in November and December, but we managed to get a good number out for coordination in January, so our on hand total is within acceptable limits. We had an abnormally large number of cases out for authentication; February's "to Printer" entry on Table A will be fattened by these cases.

4. Most of the suspended cases listed on Table C were also on the list attached to the October report, though the current list is far shorter. The notes on the table make it self-explanatory.

5. Not reflected in the attachments is the fact that 118 of our jobs have been in process for 90 days or more. Of these 56% were received prior to 1968, and we are still striving to clean up this backlog of ancient cases. Another 15% are dated in the first half of 1968. The 34 cases dated in the period July through October 1968 are the residue of the 119 cases which were received in RCB during those months. These figures are inconclusive, but they illustrate a problem discussed by Chief, Support Services Staff in his critical review of the branch and also alluded to in our budget submission; namely, the more active role which the branch has assumed in the regulatory process,

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while most rewarding in a qualitative sense and while expediting individual cases, costs time, and backlogs which used to be distributed to various originators with requests to "resolve differences and advise" now build up in the branch. This has not reached dangerous proportions as yet, but the trend is clear; if we are to continue participating actively in the coordination process we will need additional manpower.

6. Many cases are delayed after they have left the branch, of course. As before, and despite our adoption in October of a standard coordination period of 20 days, the biggest single cluster of such cases is held by DDP/PC. Table D is a copy of the 11 February list of delinquent proposals. I presented the list to [ ] C/DDP/PC, on 14 February, and in the discussion I advised [ ] that the list would be part of a periodic report to the ADDS. I also expressed my concern over the fact that so many of our jobs in process, including many on the DDP/PC list, had been in process for over 90 days. Several points made by [ ] deserve noting here:

a. While he admits he might see things differently were he in my shoes, he does not personally attach much significance to the speedy processing of regulations.

b. He believes the present backlog of cases in DDP/PC is temporary, generated by a period of particularly heavy demands on his time.

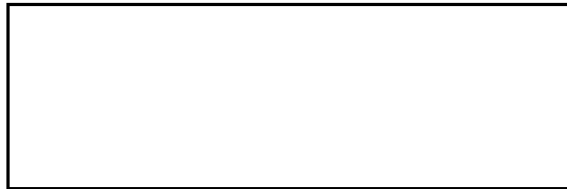
c. He still thinks the 20-day coordination period agreed to in October is one he can honor when his workload is more normal.

7. The cases on which [ ] holds the key represent a third of our active cases. It is difficult to devise a control system to insure timely processing of cases when a third of the cases are controlled, in effect, by another unit which is not responsive to our priority system. My own relationship with [ ] has remained most cordial, I am grateful to say; our discussion on 14 February could hardly have been more amicable. He admits candidly, however, that rapid processing of regulations is not a goal to which he is committed. Our own commitment to that goal cannot be realized unless shared by all participants in the process.

8. I have no desire to attack [ ] whose substantive contribution to the finished product is always thoughtful and often creative. I do disagree with his imposition of his own editorial standards but even here he has often contributed to the clarity of our product. The issue is not personal, but rather has to do with what degree of priority the organization wants to apply to the processing of its regulations. The IG, in October 1965, recommended that "the Deputy Director for Support fix and enforce a specific deadline for

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the coordination of each proposed regulation, not to exceed 30 days." This concept has been accepted in practice by DDI, DDS&T, OGC and PPB, responding on behalf of the Executive Director-Comptroller. To make the program truly effective we need the cooperation of DDP, as well.



Chief, Regulations Control Branch

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Attachments: As stated

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TABLE A

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## REGULATIONS CONTROL BRANCH

## JOBS RECEIVED AND COMPLETED

<u>MONTH</u>	<u>IN-PROCESS</u> <u>(Beginning of Month)</u>	<u>RECEIVED</u>	<u>TO</u> <u>PRINTER</u>	<u>CANCELLED</u>	<u>IN PROCESS</u> <u>(End of Month)</u>
1968					
June	169	22	24	0	167
July	167	37	30	12	162
August	162	33	13	19	163
September	163	22	34	3	148
October	148	27	25	7	143
November	143	38	18	1	162
December	162	28	30	1	159*
January	157*	18	17	1	157

\*Discrepancy believed due to double-handling of records of cases complete but not yet distributed by OL/PSD.  
Record system amended.



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TABLE B

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## REGULATIONS CONTROL BRANCH

## STATUS OF JOBS IN PROCESS

<u>DATE</u>	<u>ON HAND AND ACTIVE</u>	<u>OUT FOR COORDINATION</u>	<u>OUT FOR AUTHENTICATION</u>	<u>OUT FOR RESOLUTION OF DIFFERENCES</u>	<u>OUT FOR REWRITE</u>	<u>SUSPENDED</u>	<u>TOTAL IN PROCESS</u>
<u>1968</u>							
31 May	46	16	10	42	4	51	169
30 June	48	14	14	38	2	51	167
31 July	60	17	8	32	6	39	162
31 August	65	29	10	22	9	28	163
30 September	38	36	7	21	7	39	148
31 October	41	36	6	21	6	33	143
30 November	69	17	9	28	6	33	162
31 December	65	19	8	34	6	27	159
31 January	44	33	14	35	7	24	157*

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TABLE C

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## REGULATIONS CONTROL BRANCH

JOBS IN SUSPENSE - 11 February 1969

ISSUANCE	JOB NO.	TITLE	COMMENT	
	3264	Emergency Plans	Present Emergency Planning Officer will retire this year. Action seems unlikely until replacement named. Last action 1965. Reactivation will require new drafts. Plan to cancel existing jobs and retire files.	
	3265	Building Emergency Plans		
	3266	Headquarters Emergency Plan		
	3267	CIA Emergency Security Patrol		
	4401	Career Training Program	To be canceled. Memo expected soon from OTR.	
	4542	Limitation on Home Leave	Task Force items. We understand new proposals are in process.	
	4543	" " " "		
	4631	Leave		
	4632	"		
	5068	Per Diem	This was an attempt at pre-coordination so we could act promptly when Congress raised the domestic per diem rate. They didn't, but hope springs eternal....	
	5069	" "		
	4957	Subsistence		
	5070	Representation Allowances		
	4390	Real Estate and Construction	Withdrawn for redrafting by OL/RE&C following new policy decision on real estate controls and reports.	
	4391	" " " "		
	4684	Utilities Services		
	4683	Procurement and Supply of		
	4685	Furniture, Furnishings and Household Equipment		
	4687			Related to <input type="text"/>
				<input type="text"/> Difference of view expressed by IG under consideration in OL.

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TABLE C

TABLE C  
Page 2JOBS IN SUSPENSE - 11 February 1969  
(Continued)ISSUANCEJOB NO.TITLECOMMENT3361  
3481  
2864Forms Management  
Records Disposition Handbook  
Correspondence ManualRAB is currently working on  
correspondence manual, and  
requests we keep all three  
in suspense for a while  
longer.

5252

Consultative Medical Services

Held pending redrafting in  
OMS. Advised 2/13 that new  
proposal should reach us  
shortly.

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IN DDP/PC FOR COORDINATION

	<u>RCB JOB NO.</u>	<u>ISSUANCE NO.</u>	<u>TITLE</u>	<u>DATE SENT TO DDP/PC</u>	<u>REMARKS</u>
5X1	5013		Security in Office Routine	7/29/68	10-day coordination.
5X1	5043			9/6/68	10-day coordination.
	5174		Reporting Unforeseen Absences	8/16/68	20-day coordination.
(	5248		Release of CIA Information to	11/13/68	}-- 5-day coordination.
(			Public		
(	5120		Controls for Dissemination	11/13/68	
(	5261		Special Appointment	12/2/68	}-- 20-day coordination.
(	5262		Considerations		
(	5240		Summary of Agency	12/5/68	}-- 15-day coordination.
(	5241		Employment		
(	5198		Travel and Transportation Expenses	1/10/69	} 20-day coordination.
(	5199		" " " "		
(	5200		Travel Advances for Retirees	1/10/69	} 20-day coordination.
(	5201		" " " "		
(	4822		Reporting Misuse of Funds	12/31/68	}--
(	4823				
(	4824				
(	4825				
(	5263		Settlement of Accounts	1/3/69	} 20-day coordination.
(	5264				
(	5265				
(	5266				
(	5267				
(	5268				

11 February 1969

IN DDP/PC FOR COORDINATION  
(Continued)

<u>RCB JOB NO.</u>	<u>ISSUANCE NO.</u>	<u>TITLE</u>	<u>DATE SENT TO DDP/PC</u>	<u>REMARKS</u>
( 5269	<div style="border: 1px solid black; width: 100px; height: 50px;"></div>	Settlement of Accounts (continued)	1/3/69 )	20-day coordination.
( 5270				

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11 February 1969

IN DDP/PC FOR COMMENT OR RESOLUTION OF DIFFERENCES

RCB JOB NO.	ISSUANCE NO.	TITLE	DATE SENT TO DDP/PC	REMARKS	
( 4842		Pay and Allowances for Missing Persons		Proposed May 1967. DDP authentication requested June 1967. DDP/OPSER suggested clarification August 1967. O/F awaiting DDP comment on change subsequently submitted.	
( 4843					
( 4427			Custody of Funds	4/20/67	Proposed in 1965. Out for coordination November 1965. C/OPSER comments, received September 1966, to O/Finance for resolution of differences. O/F memo to DDP 20 April 1967. Most recent exchange September 1968. O/F awaiting views of C/OPSER on compromise language
( 4428					
( 4290					
( 4252					
( 4359					
4844			Personnel Transfers		Proposed April 1967. DDP authentication requested July 1967. Memo from C/OPSER, August 1967, sent to O/F, which now awaits DDP/PC agreement on revised version.
4784		CIA Briefing and Debriefing Program		10 January DDP comments received our suggested change given to [redacted] secretary 1/24/69.	

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